

speaks for itself, and, to the extent the allegations in Paragraph 4 of the Complaint are inconsistent with the Lease, as amended, American Towers denies those allegations.

5. In response to the allegations in Paragraph 5 of the Complaint, American Towers admits that it placed a generator on the leased portion of the Property, and denies the remaining allegations in Paragraph 5 of the Complaint.

6. American Towers denies the allegations in Paragraph 6 of the Complaint.

7. American Towers denies the allegations in Paragraph 7 of the Complaint.

8. American Towers denies the allegations in Paragraph 8 of the Complaint.

9. American Towers denies the allegations in Paragraph 9 of the Complaint.

10. American Towers denies each and every allegation not specifically admitted herein

11. As to the unnumbered paragraph in the Complaint beginning “WHEREFORE,” American Towers denies that Plaintiff is entitled to the requested relief, or any other relief.

FIRST DEFENSE

Plaintiff’s claims are barred by waiver and acquiescence.

SECOND DEFENSE

Plaintiff’s claims are barred by laches and equitable estoppel.

THIRD DEFENSE

Plaintiff’s claims are barred by the doctrine of unclean hands

FOURTH DEFENSE

Plaintiff’s claims are barred by consent.

FIFTH DEFENSE

Plaintiff's claims are barred due to American Towers' lawful occupation of the land under the Lease Agreement.

WHEREFORE, Defendant, American Towers LLC, asks this Court enter judgment in its favor and against the Plaintiff, to award American Towers its costs, and to grant American Towers all further relief as this Court deems fair and just.

Dated: April 1, 2016

Respectfully Submitted;

/s/ Elizabeth A. Scully

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CERTIFICATE OF SERVICE

Elizabeth Scully, an attorney, certifies that she served the foregoing Defendant's Answer and Affirmative Defenses on April 1, 2016 upon the following by the United States District Court's ECF system:

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/s/ Elizabeth Scully
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